

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:

FIRESTAR DIAMOND, INC., *et al.*

Debtors.<sup>1</sup>

Chapter 11

No. 18-10509 (SHL)

(Jointly Administered)

**SECOND SUPPLEMENTAL DECLARATION OF ANGELA M. ALLEN IN SUPPORT OF  
THE APPLICATION AUTHORIZING THE EMPLOYMENT OF JENNER & BLOCK LLP AS  
ATTORNEYS FOR THE TRUSTEE, NUNC PRO TUNC TO JUNE 14, 2018**

I, Angela M. Allen, declare the following is true to the best of my knowledge, information, and belief:

1. I am a partner in Jenner & Block LLP ("**Jenner & Block**" or the "**Firm**"), a law firm with offices in Chicago, Illinois; New York, New York; Washington, D.C., Los Angeles, California, and London, United Kingdom.<sup>2</sup> I am currently resident in Jenner & Block's Chicago office, located at 353 North Clark Street, Chicago, IL 60654. I am a member in good standing of the bar of the State of Illinois, and there are no disciplinary proceedings pending against me.

2. I submit this second supplemental declaration (the "**Second Supplemental Declaration**") to supplement my original declaration (the "**Original Declaration**") [Dkt. 234, Ex. B] and supplemental declaration (the "**First Supplemental Declaration**") [Dkt. 643] filed in connection with the Application of the Trustee, Richard Levin, in the above-captioned jointly administered chapter 11 cases (the "**Chapter 11 Cases**") for an order approving the employment of Jenner & Block as the Trustee's attorneys *nunc pro tunc* to June 14, 2018. Unless otherwise stated in this Supplemental Declaration, I have personal knowledge of the facts set forth herein.

---

<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are as follows: Firestar Diamond, Inc. (2729), Fantasy, Inc. (1673), and Old AJ, Inc. f/k/a A. Jaffe, Inc. (4756).

<sup>2</sup> The London office is operated by a separate partnership, Jenner & Block London LLP, which is affiliated with Jenner & Block.

3. To the extent that any information disclosed herein requires subsequent amendment or modification upon Jenner & Block's completion of further analysis or as additional information regarding creditors and other parties in interest becomes available, one or more supplemental declarations will be submitted to the Court reflecting the same.

### **Compensation**

4. In my Original Declaration, I disclosed Jenner & Block's billing rates in effect at that time for matters related to these Chapter 11 Cases. I also disclosed that the billing rates are subject to periodic adjustment to reflect economic and other conditions.

5. In accordance with ordinary practice, some billing rates for Jenner & Block professionals will change effective as of January 1, 2020. The rates may have changed to due promotion or rate increases. Jenner & Block's billing rates that will take effect on January 1, 2020 for matters related to these Chapter 11 Cases range as follows:

Partners	\$650 to \$1,400
Counsel	\$600 to \$1,300
Associates	\$510 to \$880
Staff Attorneys	\$440 to \$525
Discovery Attorneys	\$265 to \$275
Paraprofessionals	\$230 to \$400

6. The hourly rates set forth above are consistent with the rates that, effective January 1, 2020, Jenner & Block will charge other comparable clients for similar services, whether in or outside of chapter 11, regardless of the location of the client or the court in which a matter is pending. The hourly rates listed above are appropriate and not significantly different from (a) the rates that Jenner & Block will charge for other similar types of representations or (b) the rates that other counsel of similar expertise and experience would charge to do work similar to the work Jenner & Block will perform in these Chapter 11 Cases.

7. Prior to the filing of this Supplemental Declaration, I discussed the rate increases set forth above with the Trustee.

**Disinterestedness**

8. Through Jenner & Block's client intake process, the firm has identified the following new connections:

- a. Fidelity Investments, which is listed on the Debtors' Schedules as a general unsecured creditor, became a client of Jenner & Block on unrelated matters.

9. Fidelity Investments became a Jenner & Block client after I filed my Original Declaration and First Supplemental Declaration.

10. Fidelity Investments is no longer a client of Jenner & Block.

11. Notwithstanding the foregoing and based on the information contained in the Original Declaration and First Supplemental Declaration, I believe that I am, and each Jenner & Block attorney is, still a "disinterested person" as that term is defined in 11 U.S.C. § 101(14); that neither I nor any Jenner & Block attorney holds or represents any interest adverse to the Debtors' estates; and that Jenner & Block's attorneys do not represent in other matters parties with any interest adverse to the Debtors' estates, except as otherwise specified in the Original Declaration, the First Supplemental Declaration, and this Second Supplemental Declaration. Accordingly, I submit that Jenner & Block is not disqualified for employment by the Trustee in these chapter 11 cases.

12. I will amend this Second Supplemental Declaration promptly upon learning that: (a) any of the representations herein are incorrect, or (b) there is any change of circumstance relating thereto.

13. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: December 17, 2019,  
Chicago, Illinois

/s/ Angela M. Allen  
Angela M. Allen